UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. BLR 9004-1(b)

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Attorneys for Arch Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty Insurance

Company

In re:

BLOCKFI INC., et al..

Debtors.1

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Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a Confirmed Plan)

Hearing Date: April 25, 2024, at 11:30 (ET)

Response Deadline: April 15, 2024, at 4:00 p.m. (ET)

JOINDER TO THE OPPOSITION OF NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA TO WIND-DOWN DEBTOR BLOCKFI, INC.'S MOTION FOR ORDER REMANDING TO STATE COURT

The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

ACE American Insurance Company, Arch Insurance Company, Axis Insurance Company, Berkley Insurance Company, Berkshire Hathaway Specialty Insurance Company, Endurance American Specialty Insurance Company, U.S. Specialty Insurance Company, and XL Specialty Insurance Company (collectively, the "Insurers") by and through undersigned counsel, hereby file this joinder (the "Joinder") to the National Union Fire Insurance Company of Pittsburgh, PA Opposition to Wind-Down Debtor BlockFi Inc.'s Motion for an Order Remanding to State Court [ECF No. 2239] (the "Opposition"). In support of this Joinder, the Insurers state as follows:

- 1. The Insurers incorporate by reference and hereby join in all arguments set forth in the Opposition.
- 2. The Insurers respectfully request that the Court deny *The Wind-Down Debtor BlockFi, Inc.'s Motion for an Order Remanding State Court Action* [ECF No. 2181-1].

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Dated: April 15, 2024 New York, New York

Respectfully submitted,

DLA PIPER LLP (US)

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